

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROCKDALE COUNTY,

Plaintiff,

v.

BIO-LAB INC., et al.,

Defendants.

C.A. No. 1:24-cv-04916

JURY TRIAL DEMANDED

**NOTICE OF PROPOSED AGENDA FOR
STATUS CONFERENCE**

Plaintiff Rockdale County and Defendants Bio-Lab, Inc., KIK International, LLC, and KIK Custom Products, Inc., (together, “Parties”), pursuant to this Court’s March 24, 2025, Minute Order in case No. 1:24-cv-04407-SEG, submit the following *Notice of Proposed Agenda* for the September 9, 2025, Status Conference.

Agenda 1: Discovery Update

On March 31, 2025, Defendants served Plaintiff with correspondence related to Plaintiff’s initial disclosures. On May 15, 2025, Plaintiff served Defendants with its Objections and Responses to Bio-Lab Inc. and KIK Defendants’ First Set of Requests for Production of Documents, as well as its Supplemental Initial Disclosures. Plaintiff served supplemental productions of documents on May 23, 2025.

On June 30, 2025, Plaintiff served Defendants with its First Set of Requests for Production of Documents. On July 30, 2025, Defendants served Plaintiff with their Responses and Objections to Plaintiff's First Set of Requests for Production of Documents.

On August 8, 2025, Plaintiff served Defendants with correspondence related to Defendants' Initial Disclosures. Defendants provided a supplemental response to their Initial Disclosures on August 12, 2025.

Plaintiff sent Defendants correspondence relating to Defendants' responses to Plaintiff's First Set of Requests for Production of Documents on August 25, 2025 and Defendants responded on September 4, 2025. The parties are continuing to meet and confer relating to this correspondence.

In accordance with this Court's footnote 10 in its *Order Granting Motion to Consolidate Cases* (Doc. 146 in Case No. 1:24-cv-04407-SEG), Plaintiff has requested a duplicate of all Defendants' responses and productions in the *In Re: Bio-Lab Class Action*, Case No. 1:24-cv-04407-SEG be served on Plaintiff. Defendants have responded that this request fails to account for the differences in the scope and facts at issue in this case. The parties are continuing to meet and confer relating to this request.

Agenda 2: Motion Practice

On September 3, 2025, the Court issued its Decision on Defendants *Partial Motion to Dismiss or in the Alternative to Strike* (Doc. 48). Plaintiff is reviewing the Decision and considering next steps.

<p>Dated: September 4, 2025</p> <p><u>/s/ Michael A. Caplan</u> Michael A. Caplan Ga. Bar No. 601039 Michael L. Eber Ga. Bar No. 859338 Emily C. Snow Ga. Bar No. 837411 Alan M. Long Ga. Bar No. 367326 CAPLAN COBB LLC 75 Fourteenth Street NE, Suite 2700 Atlanta, Georgia 30309 Tel: (404) 596-5600 Fax: (404) 596-5604 mcaplan@caplancobb.com meber@caplancobb.com jarnold@caplancobb.com esnow@caplancobb.com along@caplancobb.com</p> <p>ALAN E. SCHOENFELD* THOMAS K. BREDAR* WILMER CUTLER PICKERING HALE AND DORR LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 Tel: (212) 230-8800</p>	<p>Respectfully submitted,</p> <p><u>/s/ Mirza Qader Ali Baig</u> Mirza Qader Ali Baig (GA # 031610) M. QADER A. BAIG & ASSOCIATES, LLC 913 Commercial Street NE Suite B Conyers GA 30012-4537 Tel. (770) 929-1665 mqab@mqablaw.com</p> <p><u>/s/ Shayna E. Sacks</u> Shayna E. Sacks (Admitted Pro Hac Vice) NAPOLI SHKOLNIK PLLC 360 Lexington Avenue Floor 11 New York NY 10017-6502 Tel. (212) 397-1000 ssacks@napolilaw.com</p> <p>Hunter J. Shkolnik (Admitted Pro Hac Vice) Paul J. Napoli (Admitted Pro Hac Vice) Veronica N. Vazquez (Admitted Pro Hac Vice) NS PR LAW SERVICES LLC 1302 Avenida Ponce de León</p>
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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, allowing the font type of Book Antiqua and point size of 13.

/s/ Shayna E. Sacks
Shayna E. Sacks

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on September 4, 2025 via the Court's CM/ECF system.

/s/ Shayna E. Sacks
Shayna E. Sacks